

Freedom Court Reporting, Inc

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION
4 Case No. 2:08-cv-422 TJW
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7 DEPOSITION OF BETHANY J. MAYNARD
8 July 16, 2010
9 -----

10 PATTY BEALL, MATTHEW MAXWELL, TALINA MCELHANY and
11 KELLY HAMPTON, individually and on behalf of all others
12 similarly situated,

13 Plaintiffs,

14 vs.

15 TYLER TECHNOLOGIES, INC., and EDP ENTERPRISES, INC.,

16 Defendants.
17 -----

18 APPEARANCES:

19 ZELBST, HOLMES & BUTLER, by
20 Ms. Chandra L. Holmes Ray
21 P.O. Box 365
22 411 Southwest Sixth Street
23 Lawton, Oklahoma 73502
24 Appeared on behalf of the Plaintiffs.

25 MORGAN, LEWIS & BOCKIUS, LLP, by
Mr. Paulo B. McKeeby
1717 Main Street, Suite 3200
Dallas, Texas 75201
Appeared on behalf of the Defendants.

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1 Q Where is your physical place of employment?

2 A Wauwatosa, Wisconsin.

3 Q How long have you been employed with Briggs &

4 Stratton?

5 A Since March of 2007.

6 Q And is that the job that you took after leaving

7 Tyler Technologies?

8 A Yes.

9 Q When you were employed with Tyler, did you refer to

10 your employer as Tyler or as Munis or as something

11 else?

12 A Munis.

13 Q Did you have an awareness I take it of the entity

14 Tyler Technologies while --

15 A Yes.

16 Q -- you were employed at Munis?

17 A Yes.

18 Q And what was your understanding as to the

19 relationship between Tyler and Munis?

20 A Munis is -- was a subsidiary of Tyler.

21 Q And you left -- I'm going to refer to it as Tyler

22 just because that's what I'm used to. Is that

23 acceptable?

24 A Sure, yes.

25 Q And you left Tyler in March of 2007; correct?

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1 A Yes.

2 Q And just so that we have the start date, would you
3 agree with me that your date of hire by Tyler was
4 December of 2002?

5 A Yes.

6 Q And your job at Tyler was implementation
7 specialist?

8 A Yes.

9 Q Would you agree with me that that was the only job
10 title that you had during your employment with
11 Tyler?

12 A That was my only job title, yes.

13 Q And to whom did you report as an implementation
14 specialist at Tyler?

15 A Jane Grant.

16 Q And did you report to Ms. Grant throughout the
17 tenure of your employment with Tyler?

18 A Yes.

19 Q And I understand that at least at the beginning
20 that you worked out of Tyler's office in Falmouth,
21 Maine?

22 A Yes.

23 Q Did that change during any time in your employment?

24 A Yes.

25 Q When did it change?

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1 STATE OF WISCONSIN)
) SS.
2 MILWAUKEE COUNTY)
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4 I, Elaine A. Thies, RPR and Notary
5 Public in and for the State of Wisconsin, do hereby
6 certify that the preceding deposition was recorded by
7 me and reduced to writing under my personal
8 direction.

9 I further certify that said deposition
10 was taken at Gramann Reporting, Ltd., 710 North
11 Plankinton Avenue, Milwaukee, Wisconsin, on the 16th
12 day of July, 2010, commencing at 9:45 a.m. and
13 concluding at 12:06 p.m.

14 I further certify that I am not a
15 relative or employee or attorney or counsel of any of
16 the parties, or a relative or employee of such
17 attorney or counsel, or financially interested
18 directly or indirectly in this action.

19 In witness whereof, I have hereunto
20 set my hand and affixed my seal of office on this
21 26th day of July, 2010.

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ELAINE A. THIES - Notary Public
In and for the State of Wisconsin

My commission expires 1-12-14.